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10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12  
13

14 LAURA ELENA GONZALEZ,  
15 Plaintiff,  
16 v.  
17 ANDREW SAUL,  
Commissioner of Social Security,  
18 Defendant.  
19

No. 1:20-cv-00336-EPG

STIPULATION FOR AN EXTENSION OF  
TIME; ORDER

20  
21  
22 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
23 counsel of record, that the time for Defendant to respond to Plaintiff's Opening Brief be extended  
24 thirty (30) days from February 18, 2021, up to and including March 20, 2021. This is the parties'  
25 first stipulation for an extension of the Court's Scheduling Order. Plaintiff has stipulated to the  
26 request and Defendant understands that this thirty-day extension does not require court approval  
27 and files this stipulation pursuant to the requirements of the Court's Scheduling Order.  
28

1 Good cause exists for this request. Defendant respectfully requested this additional time  
2 because Counsel responsible for briefing the matter has been unable to devote the time required to  
3 complete Defendant's response to Plaintiff's Opening Brief because of competing workload  
4 requirements including several merit briefs being due in the next few days.

5 A thirty-day extension until March 20, 2021 should give sufficient time for the assigned  
6 attorney to complete the response to Plaintiff's Opening Brief. Counsel apologizes to the Court  
7 for any inconvenience caused by this delay.

8 The parties further stipulate that the Court's Scheduling Order shall be modified  
9 accordingly.

10 Respectfully submitted,

11 DATE: February 18, 2021

By s/ Jonathan O. Pena\*  
Jonathan O. Pena, Esq.  
Pena & Bromberg, Attorneys at Law

13 Attorney for Plaintiff  
14 (\*as authorized by email)

16 MCGREGOR W. SCOTT  
17 United States Attorney

18 DATE: February 18, 2021

By s/ Daniel P. Talbert  
DANIEL P. TALBERT  
Special Assistant United States Attorney

20 Attorneys for Defendant

21 OF COUNSEL:

22  
23 Oscar Gonzalez de Llano  
24 Assistant Regional Counsel  
Social Security Administration, Region IX

**ORDER**

Pursuant to the stipulation of the parties (ECF No. 17), IT IS ORDERED that Defendant shall file a response to Plaintiff's opening brief no later than March 20, 2021. All subsequent deadlines are extended accordingly.

IT IS SO ORDERED.

Dated: **February 19, 2021**

/s/ Eric P. Shoup  
UNITED STATES MAGISTRATE JUDGE